

S O W E L L + D U R A N T

December 27, 2018

VIA SC PUBLIC SERVICE E-FILING DMS

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210.

RE: In re: In the Matter of: Application of Duke Energy Carolinas, LLC for
Adjustments in Electric Rate Schedules and Tariffs
Docket No. 2018-318-E

Dear Ms. Boyd:

Please find attached for electronic filing with the South Carolina Public Service Commission a copy of the Petition to Intervene of Vote Solar in this case. By copy of this letter and as evidenced on the Certificate of Service, I am serving a copy of the attached by electronic mail and U.S. Mail on the parties of record.

Please feel free to contact me should you have any questions about this filing.

Sincerely,



Bess DuRant

BJD/aak

cc: Service List for Docket 2018-318-E

BESS J. DURANT

Member

sowelldurant.com

803.722.1100



a South Carolina Limited Liability Company

803-722-1102 (direct)

bdurant@sowelldurant.com

1325 Park Street, Suite 100
Columbia, SC 29201

**BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

DOCKET NO. 2018-318-E

IN THE MATTER OF:

Application of Duke Energy Carolinas, LLC for
Adjustments in Electric Rate Schedules
and Tariffs

)
)
)
)
)
)

**PETITION TO INTERVENE
OF VOTE SOLAR**

Pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission (“Commission”), Vote Solar hereby respectfully petitions to intervene in the above-captioned docket. Vote Solar states the following grounds in support of this petition:

1. Vote Solar is a non-profit, grassroots organization that works to foster economic opportunity, promote energy independence for consumers, and address environmental concerns by making solar generation accessible and cost-effective for all Americans. Vote Solar works to bring solar into the mainstream by engaging at the local, state, and federal levels to help remove regulatory barriers and implement policies and programs to bring solar to scale. Established in 2002, Vote Solar has over 60,000 members nationally and more than 2,400 in South Carolina, some of whom reside within the service territory of Duke Energy Carolinas, LLC (“DEC”).

2. In its regulatory work, Vote Solar is particularly focused on rate design and public policy issues related to consumer use of and access to distributed solar generation. Recognizing the importance of programs and regulatory constructs for supporting customer-sited and other forms of distributed solar, Vote Solar has actively participated in utility commission proceedings across the country involving net metering, interconnection, rate design, and resource procurement, including Arizona, California, Colorado, Florida, Georgia, Idaho, Louisiana, Massachusetts, Minnesota, Nevada, New Mexico, New York, North Carolina, Utah, Vermont,

and Wisconsin. In each of these cases, Vote Solar effectively advocated against the unreasonable imposition of barriers or rate changes that would negatively impact consumers' ability to utilize distributed solar generation to effectively manage electricity costs.

3. The name and principal business address of Petitioner:

Vote Solar
360 22nd St., #730
Oakland, CA 94612

4. Pursuant to Rule R.103-804(5) of the Commission's Rules of Practice and Procedure, Vote Solar is represented in this proceeding by counsel who is duly licensed to practice law in the State of South Carolina: and requests that undersigned counsel be added to the official service list:

Bess J. DuRant
Sowell & DuRant, LLC
1325 Park Street, Suite 100
Columbia, SC 29201
Phone: (803) 722-1100
Fax: (803) 281-8890
Email: bdurant@sowelldurant.com

5. Vote Solar consents to service via electronic mail and requests that all communications regarding this docket should be directed to Vote Solar's counsel of record and the following person:

Thadeus B. Culley
Vote Solar, Regional Director
1911 Ephesus Church Road
Chapel Hill, NC 27517
thad@votesolar.org

6. Vote Solar has a substantial interest in the subject matter of this proceeding. Vote Solar and its members support fair rate design policies that foster the growth and accessibility of distributed solar generation in South Carolina. The outcome of this proceeding could significantly impact these objectives by reducing the ability of consumers to lower their electric bills through

a drastic increase in monthly basic facilities charges, as proposed in DEC's application. Vote Solar also has an interest in grid modernization and the implications that DEC's grid investment plan will have on the ability of consumers to utilize distributed solar generation and the ability of DEC's transmission and distribution systems to facilitate and integrate additional distributed energy resources going forward.

7. As demonstrated in DEC Witness Oliver's Exhibit No. 10, Vote Solar has been an active stakeholder participating in workshops hosted by DEC and Duke Energy Progress, LLC in South Carolina on the subject of the grid improvement plan. Vote Solar has an interest in participating as a party to continue to express its positions and concerns regarding DEC's grid improvement plan in this proceeding.

8. No other party will adequately represent Vote Solar's interest in this case.

WHEREFORE, Vote Solar respectfully requests that the Commission allow it to intervene in this proceeding and to participate fully as a party in order to protect its unique and substantial interest in this case.

Respectfully submitted this 27th day of December, 2018.

SOWELL & DuRANT, LLC

By: 

Bess J. DuRant, SC Bar No. 77920
bdurant@sowelldurant.com
 1325 Park Street, Suite 100
 Columbia, South Carolina 29201
 (803) 722-1100

Attorneys for Vote Solar

Columbia, South Carolina
 December 27, 2018

**BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

DOCKET NO. 2018-318-E

IN THE MATTER OF:

Application of Duke Energy Carolinas, LLC for
Adjustments in Electric Rate Schedules
and Tariffs

)
)
)
)
)
)

CERTIFICATE OF SERVICE

I hereby certify that I have served the persons listed on the official service list for Docket No. 2018-318-E, listed below, a copy of the Petition to Intervene of Vote Solar via U.S. Mail and electronic mail on this day, December 27, 2018.

PARTIES SERVED

Florence P. Belser, Esq.
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
fbelser@regstaff.sc.gov

Andrew M. Bateman, Esq.
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
abatement@regstaff.sc.gov

Alexander W. Knowles, Esq.
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
aknowles@regstaff.sc.gov

Steven W. Hamm, Esq.
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
shamm@regstaff.sc.gov

Heather Shirley Smith, Esq.
Duke Energy Progress, LLC
40 W. Broad Street, Suite 690
Greenville, SC 29601
Heather.smith@duke-energy.com

Frank R. Ellerbe III, Esq.
Robinson Gray Stepp & Laffitte, LLC
Post Office Box 11449
Columbia, SC 29211
fellerbe@robinsongray.com

Stephanie U. Eaton, Esq.
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103
seaton@spilmanlaw.com

Carrie M. Harris, Esq.
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103
charris@spilmanlaw.com

Derrick Price Williamson, Esq.
Spilman Thomas & Battle, PLLC
1100 Bent Creek Blvd., Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com

John T. Burnett
Duke Energy Business Services, LLC
550 South Tryon Street
Charlotte, NC 28202
John.burnett@duke-energy.com

Robert R. Smith II, Esq.
Moore & Van Allen, PLLC
100 North Tryon Street, Suite 4700
Charlotte, NC 28202
robsmith@mvalaw.com

Molly McIntosh Jagannathan
Troutman Sanders LLP
301 South College Street, Suite 3400
Charlotte, NC 28202
Molly.Jagannathan@troutman.com



Bess J. DuRant (SC Bar #77920)

December 27, 2018